

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

MOOG, INC.,

Plaintiff,

v.

SKYRYSE, INC., ROBERT ALIN  
PILKINGTON, MISOOK KIM, and DOES NOS.  
1-50.

Defendants.

Civil Action No.  
1:22-cv-00187-LJV-JJM

**[PROPOSED] ORDER**

Defendant Skyryse has submitted a motion to compel an identification of Plaintiff Moog's alleged trade secrets. Having considered the parties' papers in support of and opposition thereto, argument of counsel, and good cause appearing therefor, the Court hereby orders as follows:

1. Skyryse's motion is GRANTED. Moog must identify with specificity every trade secret it intends to assert in this action and will not be permitted to assert trade secrets it fails to sufficiently disclose.
2. Within seven days of the entry of this Order, Moog shall:
  - a. supplement its response to Skyryse's Interrogatory No. 1, including with a narrative response that identifies with specificity each trade secret Moog alleges has been misappropriated; and
  - b. supplement its responses to Skyryse's Interrogatory Nos. 2-9 in view of the trade secrets Moog identifies in response to Skyryse's Interrogatory No. 1.

Dated: \_\_\_\_\_

\_\_\_\_\_  
The Honorable Jeremiah J. McCarthy  
United States Magistrate Judge